

Exhibit G

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**NOTICE OF DEPOSITION PURSUANT TO
FED. R. CIV. P. 30(b)(6) TO META
PLATFORMS, INC. & 30(b)1 TO
NIKOLAY BASHLYKOV**

Date: December 6, 2024

Time: 9:00 a.m. Local Time

Location: Boies Schiller & Flexner LLP

5 New St Square,

London EC4A 3BF, United Kingdom

Lead Case No. 3:23-cv-03417-VC

NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6) TO META PLATFORMS, INC.
& 30(b)1 TO NIKOLAY BASHLYKOV

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil
3 Procedure, Plaintiffs, by and through their attorneys of record, will take the deposition upon oral
4 examination of Nikolay Bashlykov on December 6, 2024, beginning at 9:00 a.m. local time at
5 Boies Schiller & Flexner LLP, 5 New St Square, London EC4A 3BF, United Kingdom, and continuing
6 as necessary until completed. Said deposition will be taken before an officer qualified to administer
7 oaths. The deposition will be recorded by stenographic and audiovisual means.

8 PLEASE TAKE FURTHER NOTICE that, in accordance with Rule 30(b)(6) of the Federal
9 Rules of Civil Procedure, Meta Platforms, Inc. (“Meta”) is hereby directed to designate one or more
10 officers, directors, managing agents, or other persons who consent to testify and are most
11 knowledgeable and competent to testify regarding the following topic(s) and related or supporting facts
12 occurring between January 1, 2016 and the present (the “Relevant Period”):

13 1. Topic 7: The origin and contents of the datasets Meta has produced in this case, labeled
14 Meta_Kadrey_Data_001, Meta_Kadrey_Data_002, Meta_Kadrey_Data_003, Meta_Kadrey_Data_004,
15 and Meta_Kadrey_Data_005, including who identified and compiled each dataset produced, and how
16 each dataset produced has been used by Meta in training each of its LLMs from Llama 1 through any
17 Llama version currently in development, including whether Meta accessed, obtained and/or sourced the
18 datasets at multiple points in time and, if so, when and for what purpose.

19 2. Topic 10: The source code provided to Plaintiffs for review, including who compiled the
20 source code; what the source code consists of; any source code repositories used by Meta’s LLMs not
21 captured by the production to date; the dates the source code was created; how recently the source code
22 has been updated; what LLM models the source code covers; how the source code is organized; what
23 models are used within each version of Llama and what each of these models do; whether any Llama
24 model uses or incorporates different tools, including for web research, and if so, what these tools do;
25 differentiations between the model production system on the web versus what Meta has shared in its
26 public repositories; source code pertaining to Meta’s efforts to train its models to identify copyrighted
27 material; whether there are any pull requests or commits from certain date ranges that are not included
28 in the source code; whether the source code produced to date includes or omits production or

application code; and any of the issues raised in the October 4, 2024 Declaration of Dr. Jonathan Krein.

The Rule 30(b)(6) deposition of Meta Platforms, Inc. on Topics 7 and 10 will commence on December 6, 2024, beginning immediately after the Rule 30(b)(1) deposition of Amrish Acharya has been completed, and will continue from day to day thereafter until completed, at the offices of Boies Schiller & Flexner LLP, 5 New St Square, London EC4A 3BF, United Kingdom. The deposition will be taken before a notary public or other officer duly authorized to administer oaths and take testimony and will be recorded by stenographic and videographic means.

Dated: November 27, 2024

By: /s/ Christopher K.L. Young
Christopher K.L. Young

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Plaintiffs and the Proposed Class*

CERTIFICATE OF SERVICE

I, the undersigned, am employed by the Joseph Saveri Law Firm, LLP. My business address is 601 California Street, Suite 1505, San Francisco, CA 94108. I am over the age of eighteen and not a party to this action.

On November 27, 2024, I caused the following documents to be served by email upon the parties listed on the attached Service List:

- **NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6) TO META PLATFORMS. INC. & 30(b)1 TO NIKOLAY BASHLYKOV**

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 27, 2024.

/s/ Heaven Y. Haile

Heaven Y. Haile

SERVICE LIST

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